

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION  
flmb.uscourts.gov

In Re:

INTERNATIONAL IRON, LLC

CASE NO: 6:19-bk-00724-KSJ

Debtor.

/

**CROSS NOTICE OF RULE 2004 EXAMINATION AND REQUEST FOR  
PRODUCTION OF DOCUMENTS**

U.S. BANK EQUIPMENT FINANCE, a division of U.S. Bank, National Association, a national banking association, a creditor of the Debtor and a party in interest (“Creditor”), by and through its undersigned attorney, pursuant to Bankruptcy Rule 2004, and Local Rule 2004-1, hereby gives notice that it will examine **Jon M. Hall, Jr.**, individually as well as in his capacity as the trustee of the Jon Mark Hall, Jr. Revocable Trust dated August 4, 2005, as amended and restated June 23, 2014 (the “JMH Trust”), and in his capacity as the president/manager of International Iron, LLC (“Debtor”) under oath on Wednesday, June 12, 2019, at 9:30 A.M. at the office of First Choice Reporting, 20 N. Orange Ave., Suite 1108, Orlando, FL 32801.

This examination is pursuant to Bankruptcy Rule 2004 and will be taken before an officer authorized to record the testimony. The scope of the examinations shall be as described in Rule 2004, including but not limited to Mr. Hall’s and the JMH Trust’s financial interests and assets, including but not limited to any of Mr. Hall’s other revocable trusts or trusts (if any), the value of Mr. Hall’s interest in such trust (or trusts), including but not limited to the JHM Trust, the assets owned by such trust (or those trusts), as well as by the JHM Trust, income received by that trust (or trusts), as well as by the JHM Trust, limited liability companies in which Mr. Hall and/or the

trust(s) own an interest, his and his trust's ownership interest in Debtor as well as in the Jon H. Hall Company LLC, and Atlantic Pipe Services, LLC, and the value thereof, his ability to fund the proposed Chapter 11 First Amended Plan as well as to pay creditors; claims, the Debtor's financial affairs both post-petition and in the three years preceding the filing of this Chapter 11 case; the Debtor's assets and liabilities, solvency and liquidity, any papers filed by Debtor in this bankruptcy case, including the Schedules and Statement of Financial Affairs, any claims against the Debtor's estate or other interested parties.

Pursuant to Local Rule 2001-1, no order shall be necessary.

**Request for Production of Documents:** Mr. Hall and Debtor must product to undersigned counsel for Creditor, within 21 days after service of this Notice (i.e., on or before June 4, 2019), the documents, electronically stored information, or objects described on the attached Exhibit A, and must permit inspection, copying, testing or sampling of the materials.

Dated this 14 day of May, 2019.

/s/ Jason Ward Johnson

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14 day of May, 2019, I electronically filed the foregoing *Cross-Notice of Rule 2004 Examination and Request for Production of Documents* with the Clerk of the Court pursuant to this Court's December 30, 2003 Revised Administrative Order Governing Electronic Case Management by using the Case Management/Electronic Case Filing ("CM/ECF") system which will send a notice of electronic filing, and I will complete service of the foregoing as required by Rule 5, Federal Rules of Civil Procedure, made applicable by Rule 7005, Federal Rules of Bankruptcy Procedure, to those on the following Service List:

/s/ Jason Ward Johnson

Service List:

Debtor: International Iron, LLC  
1920 Boothe Circle, Suite 230  
Longwood, FL 32750

EXHIBIT A

**Definitions and Instructions**

The following definitions apply to this Request.

Pursuant to Rule 2004(c), Creditor request that Jon M. Hall, Jr.) who hereinafter may be referred to as “Mr. Hall”) and Debtor, International Iron, LLC, provide documents responsive to the following Document Request on or before **21 days from the date of filing this Notice of 2004 Examination**. Creditor requests that the documents and information be provided to Jason Ward Johnson, Esq., Lowndes, Drosdick, Doster, Kantor & Reed, P.A., 215 North Eola Drive, Orlando, FL 32802. Responses and documents may also be e-mailed to Mr. Johnson at [jason.johnson@lowndes-law.com](mailto:jason.johnson@lowndes-law.com).

1. The following request are directed to Mr. Hall, the Debtor and to its attorney herein. Unless otherwise indicated, the terms “Debtor,” “you,” and “your” refer to the Debtor, International Iron, LLC. The term “Mr. Hall” shall refer to Jon M. Hall, Jr. who may also be known as Jon M. Hall, also as Jon Mark Hall, Jr., who is the trustee of the JMH Trust as well as president/manager of Debtor. For the purposes of this Document Request, these terms include any person or entity affiliated with Mr. Hall, the JMH Trust or the Debtor, any person or entity that had or has any responsibility for Mr. Hall’s or the JMH Trust’s or the Debtor’s accounts, and any person authorized to act on behalf of Debtor, including attorneys.

2. The words “document” or “documents” shall mean the unexpurgated original and each unexpurgated non-identical copy (whether different from the original because of marginal note, or other material inserted therein, or attached thereto to otherwise) of any written, graphic, or electronic matter, however produced or reproduced, whether sent or received, or neither,

including drafts and both sides thereof, and including, but not limited to: videotapes; film; audiotapes; papers; books; letters; correspondence; e-mails; telegrams; cables; telex messages; facsimiles; memoranda; notes; notations; work papers; transcripts, minutes, reports, and recordings of telephone or other conversations, or of interviews, conferences or other meetings; maps; charts; plans; specifications; diagrams; photographs; affidavits; statements; summaries; opinions; reports; investigative materials; studies; analyses; evaluations; contracts; agreements; invoices; purchase orders; work orders; work authorities; cancelled checks; delivery tickets or receipts; ledgers, journals; statistical records; desk calendars; appointment books; diaries; expenses account records; lists; tabulations; summaries; sound recordings; computer printouts; data processing input and output; microfilms; ledgers, any other records, kept by electronic, photographic or mechanical means; and items similar to any of the foregoing.

3. “Communication” shall be construed in its broadest sense and shall mean every manner means of disclosure, transfer or exchange, and every disclosure, transfer or exchange of information, whether orally or face-to-face or by telephone, mail, personal delivery, document or otherwise.

4. “Financial Statements” shall mean all quarterly and annual financial statements, profit and loss statements, balance sheets, and the like, whether prepared by the Debtor or by an account, book-keeper, or other professional.

5. In the event that you refuse to produce a requested document on the basis of a claim of privilege or immunity, please provide the following information for that document: author; addressee; indicated or blind copies; date; subject matter; number of pages; attachments or appendices; all persons to whom the document was distributed, shown or explained; present

custodian; the nature of the privilege or other immunity that is being asserted (e.g., work product); and describe with particularity the circumstances upon which you rely to support your claim.

**Documents to be Produced**  
**By Mr. Hall**

1. All Financial Statements, loan applications, as well as any list of assets and liability submitted by your or the JMH Trust to any person or entity within the last 3 years.
2. Your last pay stub(s.)
3. The last 3 statements for each bank, savings, credit union, other financial account in which you, either individually or as trustee, have an interest.
4. Your last 2 income tax returns filed.
5. The last 2 income tax returns filed for:
  - a. The JMH Trust;
  - b. The Jon M. Hall Company, LLC;
  - c. Atlantic Pipe Services, LLC;
  - d. HCME, LLC;
  - e. MMEH Holdings, LLC;
  - f. Direct Track 1 LLC;
  - g. II Rent, LLC;
  - h. JMH Holdings, Inc.; and
  - i. JMH Infrastructure Service, LLC.
6. Any deeds or title to any real or personal property you, either individually or as trustee own or are buying, as well as leases for property you, either individually or as trustee, are renting.

**By Debtor**

7. All Financial Statements for the Debtor relating to the Calendar Years 2016, 2017, and 2018.
8. All documents relating to distributions made by the Debtor to holders of the Debtor's membership interests, including, but not limited to, distributions made to Jon M. Hall, Jr., and/or the JMH Trust.
9. All documents reflecting payments, whether of salary, bonus, loan repayments, or otherwise, in cash or other property, by Debtor to or for the benefit of Jon M. Hall, Jr. from January 1, 2016, to present date.
10. All records for the Debtor's checking or money market account(s) from January 1, 2016, to present date, including, without limitation, bank statements, cancelled checks, and duplicate checks.
11. All tax returns (including all attachments and schedules) filed by the Debtor with the Internal Revenue Service or the State of Florida Department of Revenue for the tax years 2015, 2016, 2017, and 2018.
12. All documents that evidence transfers or other dispositions of any of the Debtor's assets, by gift, sale or otherwise within the two years prior to February 1, 2019.
13. All loan applications completed by or for the Debtor or on its behalf since January 1, 2016.
14. All other documents in which you have disclosed or set forth the Debtor's financial condition from January 1, 2016 to present date.

15. All ledger books, accountant books, QuickBooks files, or other documents evidencing your business transactions from January 1, 2016 to present date.